

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**DANNY JOE MCCART**

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**Case No.: 3:05-CR-147-A**

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**DEFENDANT'S REQUESTED JURY VOIR DIRE**

**NOW COMES** the Defendant, Danny McCart, by and through undersigned counsel, and requests the Court to ask the attached questions during the Voir Dire in this case, or in the alternative, permit defense counsel to inquire of the jury venire.

Respectfully submitted,

S/Christine A. Freeman

**CHRISTINE A. FREEMAN**

**TN Bar Code: 11892**

Attorney for Danny McCart

Christine\_Freeman@fd.org

FEDERAL DEFENDERS

MIDDLE DISTRICT OF ALABAMA

201 Monroe Street, Suite 1960

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**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
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**v.**

**Danny McCart, JR.**

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**REQUESTED VOIR DIRE**

1. During trial, everyone will need to hear the witnesses, the attorneys and the Court.  
With that in mind, if you can hear me clearly, please raise your hand.
2. If any of you cannot read, write, speak or understand the English language, please raise your hand.
3. If any of you cannot see well, please raise your hand.
4. Some jurors indicated on the jury questionnaire that they have health conditions which may interfere with their ability to serve as a juror. If you have any health condition that the court needs to be made aware of, please raise your hand. You may step forward to discuss the matter with the court in private if you need to.
5. If anyone is taking medication that will affect your ability to concentrate or to sit through a trial, please raise your hand. You may step forward to discuss this matter with the court in private in you need to.
6. In a criminal case, a defendant is not required to testify, and if the defendant does not testify, jurors are not supposed to draw any conclusions from that fact. Does the idea that you might not hear from the defendant disturb you or cause you any concern?

7. Does any member of the jury venire know any of the following people? (We ask the government counsel to read a list of the government's proposed witnesses).
8. Are any of you related to anyone on the staff of the United States Attorneys Office?
9. Does any member of the jury venire know either the United States Attorney or any of the Assistant United States Attorneys? (We ask the Assistant United States Attorney to please stand and give the names of each attorney in the U.S. Attorneys Office).
10. Have any of you received any training or taken any classes in law or criminal justice? If yes, briefly describe the nature of that training.
11. Have you, a member of your immediate family, or a close personal friend ever been a victim of a crime in which a firearm was used against the victim?
12. Have you, a member of your immediate family, or a close personal friend ever been a victim of a crime in which a firearm was used to defend the victim?
13. Do any of you recognize a member of this jury panel as a relative, a close friend or an acquaintance of yours? If yes, please state the relationship.
14. Are any of you now or have you ever served as a law enforcement officer? If yes, please raise your hand and state where you have been so employed.
15. Have any members of your immediate family or any close personal friends or acquaintances ever been employed in law enforcement? If yes, please raise your hand and state where they were or are so employed.
16. Will those of you who do NOT own a firearm please raise your hand?
17. Do you, a member of your immediate family, or a close personal friend belong to any groups which support gun control or work for the passage of other laws prohibiting

the ownership of firearms?

18. Have any of you ever had an unpleasant experience with a law enforcement officer?
19. The attorneys have asked me to make sure that you know that, during the course of the trial, people participating in the trial are not allowed to speak to jurors. This includes even polite or casual conversation. Please do not be offended if you see one of the attorneys or parties or witnesses in this case, and he or she does not acknowledge or speak to you. The rules of the Court prohibit them from doing so.

Respectfully submitted,

S/Christine A. Freeman

**CHRISTINE A. FREEMAN**

**TN Bar Code: 11892**

Attorney for Danny McCart

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of November 2005, I have electronically filed the foregoing with the Clerk of the U.S. District Court, using the CM/ECF system, which will send notification of such filing to the following:

Kent Brunson, Esquire  
Assistant United States Attorney

Respectfully submitted,  
S/Christine A. Freeman  
**CHRISTINE A. FREEMAN**  
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